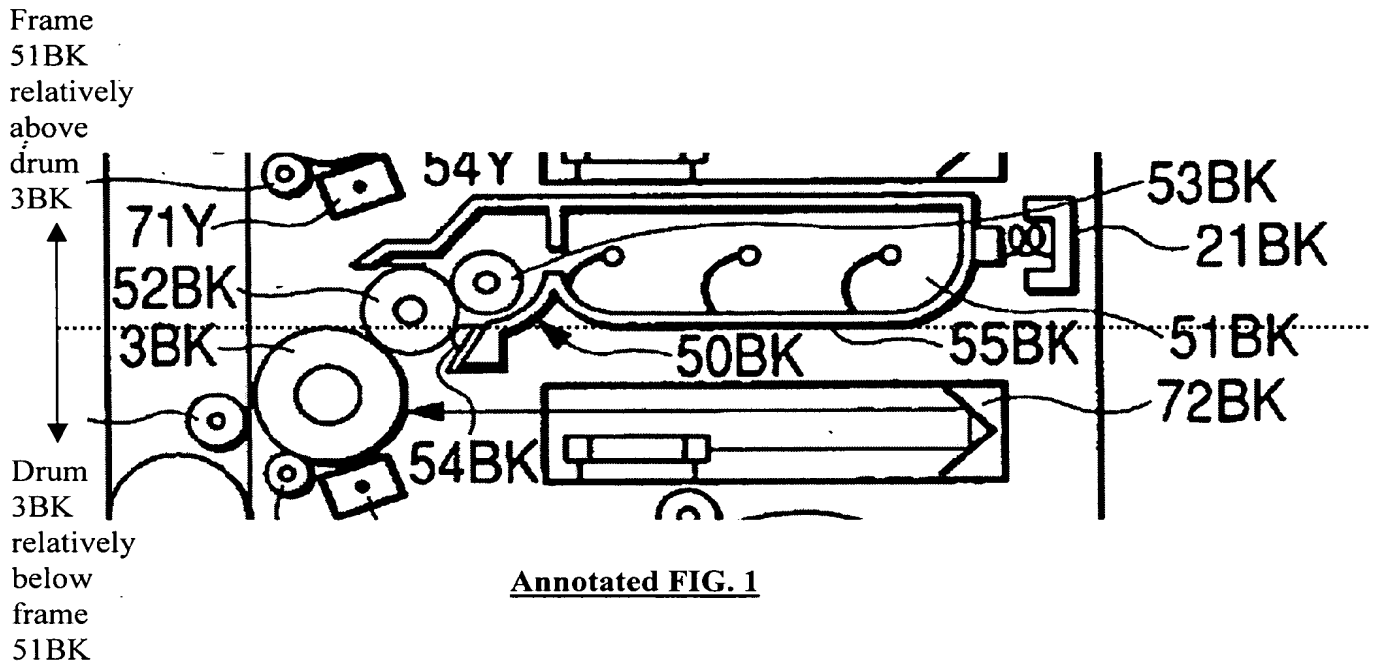


With respect to claim 2, the language of the claim was clarified in Applicant's June 8, 2007 Amendment such that it is definite. The Office Action alleges that claim 2 is indefinite because "[c]laim 2 recites that the photosensitive body defines a plurality of photosensitive drums." However, pending claim 2 does not recite a photosensitive body containing a plurality of photosensitive drums. Instead, claim 2 clearly recites "each photosensitive body comprises a photosensitive drum." Thus, the rejection is based on an erroneous interpretation of pending claim 2. Applicant respectfully requests withdrawal of the rejection.

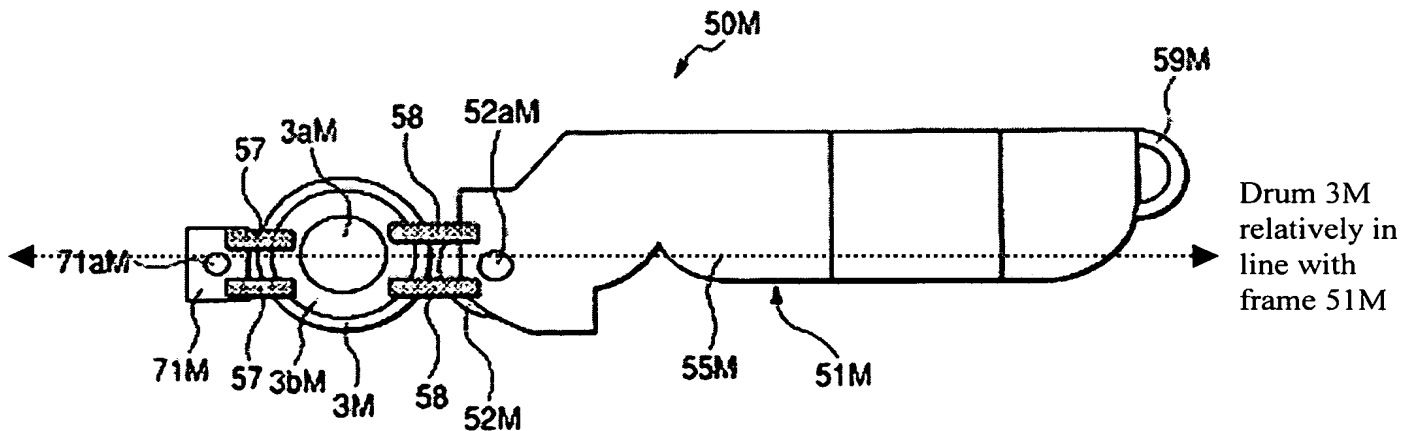
With respect to claims 27-45, the Office Action tersely alleges that "the cartridge frame does not move relative to the photosensitive body as claimed," without any explanation of why the cartridge frame allegedly does not move relative to the photosensitive body as claimed or any response to Applicant's previous arguments that the cartridge frame in fact moves relative to the photosensitive body as claimed.

Applicant respectfully maintains that the cartridge frame is disclosed as moving relative to the photosensitive body as claimed. Specifically, claim 27 recites that "the photosensitive body and the cartridge frame are connected such that positions of the photosensitive body and the cartridge frame are changeable relative to one another while the process cartridge is loaded in and unloaded from the mainframe."

An example of this type of movement is shown in at least FIGS. 1, 2, and 4A. When the process cartridge (50M, 50C, 50Y, 50BK) is loaded in the mainframe (printer 1), the photosensitive body (e.g., photosensitive drum 3M, 3C, 3Y, 3BK) is disposed below the cartridge frame (e.g., the frame of the developing device 51M, 51C, 51Y, 51BK) (see p. 16, l. 25 - p. 17, l. 9). An enlarged annotated portion of FIG. 1 is reproduced below clearly and unambiguously showing an example of the photosensitive drum 3BK relatively below the frame 51BK.



Furthermore, as shown in at least FIGS. 1, 2, 3, and 4A, when the process cartridge (50M, 50C, 50Y, 50BK) is unloaded from the mainframe (printer 1), the photosensitive body (e.g., photosensitive drum 3M, 3C, 3Y, 3BK) is disposed in line with the cartridge frame (e.g., the frame of developing devices 51M, 51C, 51Y, 51BK) (see p. 16, l. 25 - p. 17, l. 9). An enlarged annotated portion of FIG. 3 is reproduced below clearly and unambiguously showing an example of the photosensitive drum 3M relatively in line with the frame 51M.



Annotated FIG. 3

Thus, the positions of the photosensitive body and the cartridge frame are clearly and unambiguously disclosed as changeable relative to one another while the process cartridge is loaded in (Annotated FIG. 1 above) and unloaded from (Annotated FIG. 3 above) the mainframe. As a result, claims 2, 27-42, 44, and 45 are definite. Applicant respectfully requests withdrawal of the rejection.

Claims 5, 7, 12-14, 17, 23-25, 27-45, and 50 are rejected under 35 U.S.C. §103(a) over JP A 2001-255777 (Ishida) in view of U.S. Published Patent Application No. 2003/0142991 (Arimitsu). Applicant respectfully traverses the rejection.

Pending claims 14, 17, 23, and 24 depend from claim 46, which is not rejected over Ishida and Arimitsu. Thus, claims 14, 17, 23, and 24 are patentable over Ishida and Arimitsu for at least the reasons that claim 46 is patentable over Ishida and Arimitsu, as well as for the additional feature they recite.

With respect to independent claims 25 and 27, the Office Action has failed to provide a clear articulation of the reasons why the claimed invention would have been obvious, as required by MPEP §§ 2141(III) and 2142 (each citing *KSR International Co. v. Teleflex Inc.*, 550 U.S. ___, ___ (2007)).

Regarding claim 25, the Office Action correctly recognizes that Ishida at least fails to disclose that "the photosensitive body of the process cartridge is horizontally in line with an exposure unit of the mainframe when the process cartridge is loaded in the main frame" and that "the photosensitive body of the process cartridge is not horizontally in line with an exposure unit of the mainframe when the process cartridge is being unloaded from the main frame." However, the Office Action alleges that "[i]t would have been obvious to one of ordinary skill in the art at the time the invention was made to use the teaching of Ishida with an image forming apparatus such as taught by [Arimitsu] to provide an image forming device capable of holding a press-contact member and a photoreceptor drum in a state where the

capable of holding a press-contact member and a photoreceptor drum in a state where the press-contact member is not strongly pressed to the photoreceptor drum when the photoreceptor unit is single" (Office Action, p. 5). It is not entirely clear whether the Office Action is relying on Ishida as modified by Arimitsu or relying on Arimitsu as modified by Ishida. Nonetheless, the above reasoning fails to provide a clear articulation of the reasons why the claimed invention would have been obvious for at least the following reasons.

First, Arimitsu fails to disclose that "the photosensitive body of the process cartridge is not horizontally in line with an exposure unit of the mainframe when the process cartridge is being unloaded from the main frame." Specifically, due to the shapes of bearing positioning surfaces 74a, 75a 74b, and 75b of side plates 74 and 75, the process cartridge 7 of Arimitsu must be withdrawn horizontally from the main assembly (FIGS. 5 and 6). As a result, the photoconductive drum 1a-1d remains horizontally in line with the scanner unit 3a-3d when the process cartridge 7a-7d is being unloaded from the main assembly. Thus, neither Ishida nor Arimitsu disclose teach or suggest that "the photosensitive body of the process cartridge is not horizontally in line with an exposure unit of the mainframe when the process cartridge is being unloaded from the main frame," as recited in claim 25.

Second, if the Office Action is relying on Ishida as modified by Arimitsu, the Office Action has failed to provide a plausible rational for combining the references. The exposure unit is not shown or described in Ishida. Furthermore, the device of Ishida cannot have, nor be modified to have an exposure unit located horizontally in line with the photoconductor drum 10, as allegedly taught by Arimitsu. That is, as shown in FIG. 2, if an exposure unit was located horizontally in line with the photoconductor drum 10 in Ishida, any laser emitted thereby would be blocked by the case of the developer 20 or the case of the cleaning/electrification unit 30. Thus, such a modification would, improperly render the device unsatisfactory for its intended purpose in violation of MPEP §2143.01(V) because the

laser emitted by the exposure unit could not reach the photoconductor drum 10. Thus, Ishida as modified by Arimitsu fails to disclose, teach, or suggest the features of claim 25.

Third, if the Office Action is relying on Arimitsu as modified by Ishida, the Office Action has failed to provide a plausible rational for combining the references. That is, if the skilled artisan would have been motivated by the alleged teachings of Ishida to modify the device of Arimitsu to provide an image forming device capable of holding a press-contact member and a photoreceptor drum in a state where the press-contact member is not strongly pressed to the photoreceptor drum, the skilled artisan would only have modified Arimitsu to include bearing 12 formed in the vertical direction. This is because it is the bearing 12 of Ishida that prevents the press-contact member from being strongly pressed to the photoreceptor drum (Abstract, and ¶¶ [0015] and [0019]). Simply adding the bearing 12 of Ishida to the process cartridge 7a-d of Arimitsu would not result in the features of claim 25. Thus, the Office Action's alleged reasons why the claimed invention would have been obvious cannot support an obviousness rejection of claim 25.

In view of at least the foregoing reasons, claim 25 is patentable over the combination of Ishida and Arimitsu. Further, claims 5, 7, 12, and 13 are patentable for at least the reasons that claim 25 is patentable, as well as for the additional features they recite.

With respect to independent claim 27, Ishida at least fails to disclose "a mainframe including a first guide portion and a second guide portion, each of which is formed horizontally across an inside of the mainframe, and each of which curve downward at their ends" wherein "the cartridge frame is guided by and stops at the end of the first guide portion and the developing roller is guided by and stops at the end of second guide portion when the process cartridge is loaded in the mainframe." It appears that the Office Action is alleging that notches 63 and 61 are equivalent to the claimed first and second guide portions. However, notches 63 and 61 are neither formed horizontally across an inside of the mainframe nor curve downward at their

ends. Thus, Ishida discloses no structure that can reasonably be considered equivalent to the above features of claim 27. Arimitsu fails to make up for this deficiency of Ishida because Arimitsu fails to disclose any guide portions formed horizontally and that curve down at their end.

Claim 27 is thus patentable over Ishida and Arimitsu. Further, claims 28-42, 44, 45, and 50 are patentable for at least the reasons that claim 27 is patentable, as well as for the additional features they recite.

Because, claims 5, 7, 12-14, 17, 23-25, 27-42, 44, 45, and 50 are patentable over Ishida and Arimitsu, the rejection is improper. Applicant respectfully requests withdrawal of the rejection.

Claims 4, 5, 7, 8, 12-14, 16, 17, 23-25, 27-42, 44-46, 50, and 51 are rejected under 35 U.S.C. §102(e) over JP A 9-152826 (Takiguchi) in view of Arimitsu.¹ Applicant respectfully traverses the rejection.

With respect to independent claims 25, 27, 46, and 51 the Office Action has failed to provide a clear articulation of the reasons why the claimed invention would have been obvious, as required by MPEP §§ 2141(III) and 2142.

Regarding claim 25, the Office Action correctly recognizes that Takiguchi fails to disclose that "the photosensitive body of the process cartridge is horizontally in line with an exposure unit of the mainframe when the process cartridge is loaded in the main frame" and that "the photosensitive body of the process cartridge is not horizontally in line with an exposure unit of the mainframe when the process cartridge is being unloaded from the main frame." However, as discussed above, Arimitsu fails to disclose that "the photosensitive body of the process cartridge is not horizontally in line with an exposure unit of the mainframe

¹ Although the Office Action rejects claim 43, claim 43 was previously canceled and thus is not currently pending.

when the process cartridge is being unloaded from the main frame." Thus, neither Takiguchi nor Arimitsu disclose teach or suggest that "the photosensitive body of the process cartridge is not horizontally in line with an exposure unit of the mainframe when the process cartridge is being unloaded from the main frame," as recited in claim 25.

Because, both Takiguchi and Arimitsu fail to disclose that "the photosensitive body of the process cartridge is horizontally in line with an exposure unit of the mainframe when the process cartridge is loaded in the main frame" and that "the photosensitive body of the process cartridge is not horizontally in line with an exposure unit of the mainframe when the process cartridge is being unloaded from the main frame," claim 25 is patentable over Takiguchi. Further, claims 4, 5, 7, 8, 12, and 13 are patentable for at least the reasons that claim 25 is patentable, as well as for the additional features they recite.

With respect to independent claim 27, Takiguchi at least fails to disclose "a mainframe including a first guide portion and a second guide portion, each of which is formed horizontally across an inside of the mainframe, and each of which curve downward at their ends" wherein "the cartridge frame is guided by and stops at the end of the first guide portion and the developing roller is guided by and stops at the end of second guide portion when the process cartridge is loaded in the mainframe." It appears that the Office Action is alleging that crevices 3b and 7b of Takiguchi are equivalent to the claimed first and second guide portions. However, crevices 3b and 7b are neither formed horizontally across an inside of the mainframe nor curve downward at their ends. Thus, Takiguchi discloses no structure that can reasonably be considered equivalent to the above features of claim 27. Arimitsu fails to make up for this deficiency of Takiguchi because Arimitsu fails to disclose any guide portions formed horizontally and that curve down at their end.

Claim 27 is thus patentable over Takiguchi and Arimitsu. Further, claims 28-42, 44, 45, and 50 are patentable for at least the reasons that claim 27 is patentable, as well as for the additional features they recite.

With respect to independent claim 46, Takiguchi at least fails to disclose "the first elastic element connecting the photosensitive body and the cartridge frame." Takiguchi discloses an elastic element 9, which connects the developing means 2 (having the developing roller 3) and the cartridge body 5 (paragraphs [0017] and [0021], and FIG. 1). Thus, in Takiguchi, the elastic element 9 connects the developing means 2 and roller 3 to the cartridge body 5 - it does not connect the photoconductor drum 7 to the cartridge body 5. Thus, Takiguchi fails to disclose the first elastic element connecting the photosensitive body and the cartridge frame, as recited in claim 46. Arimitsu fails to make up for this deficiency of Ishida because Arimitsu fails to disclose any elastic elements connecting a photosensitive body and a cartridge frame.

Because Takiguchi and Arimitsu fail to disclose "the first elastic element connecting the photosensitive body and the cartridge frame," claim 46 is patentable over Takiguchi and Arimitsu. Further, claims 14, 16, 17, 23, and 24 are patentable for at least the reasons that claim 27 is patentable, as well as for the additional features they recite.

With respect to independent claim 51, the Office Action fails to even allege that the features of claim 51 are disclosed or taught by either of Takiguchi or Arimitsu. Thus the rejection is improper.² Nonetheless neither Takiguchi or Arimitsu disclose teach or suggest "an elastic element that connects the photosensitive body and the cartridge frame such that the developing roller is movable below an imaginary horizontal plane defined by a lowest bottom

² All positively recited features of a claim must be addressed in an Office Action. In re Angstadt et al., 190 USPQ 214 (CCPA 1976); In re Alul et al., 175 USPQ 700 (CCPA 1972); and General Electric Company v. U.S., 198 USPQ 65 (US Cl.Ct 1978). When rejecting a claim based on prior art, the Examiner must designate the particular part of the reference relied on as nearly as practicable. 37 C.F.R. §1.104(c)(2).

surface of the cartridge frame during installation of the process cartridge into an image forming apparatus," as recited in claim 51. Thus, claim 51 is patentable over Takiguchi and Arimitsu.

Because, claims 4, 5, 7, 8, 12-14, 16, 17, 23-25, 27-42, 44-46, 50, and 51 are patentable over Takiguchi, the rejection is improper. Applicant respectfully requests withdrawal of the rejection.

Claims 2, 3, 6, 15, and 18 are rejected under 35 U.S.C. §103(a) over Ishida or Takiguchi in view of Arimitsu. Applicant respectfully traverses the rejection.

This rejection is premised upon the presumption that either Ishida or Takiguchi in view of Arimitsu discloses all of the features of claims 25 and 46. Because, as discussed above, neither Ishida nor Takiguchi discloses all of the features of claims 25 and 46, the rejection is improper. Applicant respectfully requests withdrawal of the rejection.

In view of at least the foregoing, Applicant respectfully submits that this application is in condition for allowance. Applicant earnestly solicits favorable reconsideration and prompt allowance of the pending claims.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, Applicant invites the Examiner to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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